



EPSTEIN DRANGEL LLP

60 East 42nd Street, Suite 1250, New York, NY 10165

T: 212.292.5390 • E: mail@ipcounselors.com

www.ipcounselors.com

August 22, 2024

MEMO ENDORSED**VIA ECF**

Hon. Jessica G. L. Clarke
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

Re: King Spider LLC v. Panda (Hong Kong) Technology Co., Ltd. d/b/a PandaBuy
Case No. 24-cv-2668 (JGLC)
Request For Extension of Time to Oppose Defendant's Motion

Dear Judge Clarke,

We represent the Plaintiffs in the above-referenced matter (the “Action”).¹ On August 19, 2024, Defendant filed a Motion to Dissolve or Modify the Preliminary Injunction Order (“Defendant’s Motion”) (Dkts. 92-96). For the reasons set forth herein, Plaintiffs respectfully request an extension of time, until September 17, 2024 to file their opposition to Defendant’s Motion, and Defendant requests until September 27, 2024 to file its reply. The parties also respectfully request oral argument on Defendant’s Motion and respectfully propose any of the following dates: October 7, 2024 – October 11, 2024, October 21, 2024 – October 23, 2024, or any date that is most convenient for the Court. In accordance with Your Honor’s Individual Rules and Practices in Civil Cases, Plaintiffs respectfully submit the following:

1. **Original Date and New Date Requested:** Plaintiffs’ original deadline to file opposition to Defendant’s Motion is September 3, 2024 (September 2, 2023 is Labor Day), Plaintiffs respectfully request to file their opposition to Defendants’ Motion by September 17, 2024 and Defendant requests to file its reply by September 27, 2024.
2. **Number of Previous Requests for Extension:** None, this is the first request to modify the briefing schedule on Defendants’ Motion.
3. **Reason for Requested Extension:** One of the partners handling this case is currently out of the Country and Plaintiffs’ counsel has preexisting several Court ordered deadlines and hearings this week and next limiting the time Plaintiffs’ counsel’s needs to adequately review and respond to Defendants’ Motion.
4. **Whether the Adversary Consents:** Yes, counsel for Defendant consents to Plaintiffs’ instant request.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Amended Complaint.

Hon. Jessica G.L. Clarke
August 22, 2024
Page 2 of 2

5. **The Date of the Parties' Next Scheduled Appearance:** There are no presently scheduled appearances.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle S. Futterman
Danielle S. Futterman (DY 4228)
dfutterman@ipcounselors.com
60 East 42nd Street, Suite 1250
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiffs

Application GRANTED. Plaintiffs' opposition due **September 17, 2024** and Defendant's reply due **September 27, 2024**. It is hereby ordered that all parties appear for oral argument with the Court on **October 24, 2024 at 10:00 a.m.**, in Courtroom 11B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York. The Clerk of Court is directed to terminate ECF No. 98.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: August 23, 2024
New York, New York